

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Martha DELGADO-Haro  
Defendant.

Magistrate Case No.:


'07 MJ 88 13

COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about September 25, 2007, within the Southern District of California, defendant Martha DELGADO-Haro did knowingly and intentionally import approximately 19.14 kilograms (42.11 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Chad Worgen, Special Agent  
U.S. Immigration and  
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 26th  
DAY OF SEPTEMBER 2007.

  
Peter C. Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Martha DELGADO-Haro

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes furnished to U.S.  
6 Immigration and Customs Enforcement Special Agent Chad N. Worgen.

7 On September 25, 2007, at approximately 0905 hours, Martha DELGADO-Haro attempted to enter  
8 the United States from the Republic of Mexico at the Calexico, California West Port of Entry.  
9 DELGADO was the driver, registered owner, and sole occupant of a 2003 Honda Civic with California  
10 license plate number 5FDT622.

11 Customs and Border Protection Officer (CBPO) Galindo, R. was working primary lane # 6 and  
12 received a negative Customs declaration from DELGADO-Haro. Upon inspection of the vehicle, CBPO  
13 Galindo, R. noticed that both the driver and passenger side quarter panels felt and sounded solid when  
14 tapped. Galindo, R. pried open the interior portion of the quarter panel and discovered a package. CBPO  
15 Galindo, R. escorted both DELGADO-Haro and the vehicle into the secondary lot for a more intensive  
16 inspection.

17 In vehicle secondary, CBPO Galindo, R. received another negative declaration from DELGADO-  
18 Haro. CBPO Galindo, R. requested Canine Enforcement Officer (CEO) Cuen, I. to screen the vehicle with  
19 his Narcotics/Human Detector Dog. CEO Cuen, I. informed CBP Officers that his dog alerted to the  
20 vehicle. The vehicle was turned over to CBPO Garcia, J. for further processing. Upon further inspection,  
21 CBPO Garcia discovered cellophane wrapped packages within both driver and passenger side quarter  
22 panels. CBPO Garcia, J. probed a package, and it produced a green leafy substance that field-tested  
23 positive for the presence of marijuana. A total of 14 packages were extracted from the quarter panels of the  
24 vehicle with a total weight of 19.14 kilograms (42.11 pounds) of marijuana.

25 DELGADO-Haro was arrested violation of Title 21 United States Code 952 and 960,  
26 Importation of a Controlled Substance. DELGADO-Haro was booked into the Imperial County Jail, El  
27 Centro, California, pending an appearance in U.S. Magistrate Court.

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